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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of)

TELEPHONE NUMBER)
PORTABILITY)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

CC Docket No. 95-116
RM-8535

To: The Commission

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**JOINT SUPPLEMENTAL REPLY COMMENTS
OF AIRTOUCH PAGING AND
ARCH COMMUNICATIONS GROUP**

AirTouch Paging and Arch Communications Group ("Arch"), by their attorneys, hereby jointly reply to the supplemental comments filed March 29, 1996 in the above-captioned proceeding in response to the Commission's Public Notice, DA 96-358, released March 14, 1996, soliciting further comment on the matters in issue in light of the enactment of the Telecommunications Act of 1996 (the "Act"). The following is respectfully shown:

1. Thirty-one parties filed supplemental comments, of whom eight discussed the impact of the Act on the number portability obligations of Commercial Mobile Radio Service ("CMRS") providers. With one exception, all of the commenters are in agreement with the Supplemental Comments of Arch and AirTouch Paging that, because the Act specifically excludes CMRS providers from the definition of

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local exchange carrier ("LEC") and imposes a duty to provide number portability only on LECs, the Act supports earlier comments filed in this proceeding demonstrating that number portability obligations should not be imposed on CMRS carriers at this time.^{1/}

2. Only Cox Enterprises, Inc. ("Cox") suggests that the Commission should require portability between wired and wireless carriers.^{2/} According to Cox, this approach is supported by the Act, which defines number portability in terms of the ability of a customer to change from one "telecommunications carrier" to another, and CMRS providers are telecommunications carriers.

3. Cox's interpretation of the Act ignores Congress' intent, as expressed in the plain language of the statute. Section 251 of the Act, entitled "Development of Competitive Markets," distinguishes between the "General Dut[ies] of Telecommunications Carriers (Section 251(a)) and the "Obligations of All Local Exchange Carriers" (Section 251(b)). Only LECs, a subset of telecommunications

^{1/} See Supplemental Comments of Arch and AirTouch Paging; SBC Communications, Inc. ("SBC") at p. 3; BellSouth Corporation and BellSouth Telecommunications, Inc. ("BellSouth") at p. 5; MobileMedia Communications, Inc. ("MobileMedia") at p. 5; Bell Atlantic NYNEX Mobile, Inc. at 2-3; Omnipoint Corp. at n.4; Personal Communications Industry Association at 1-2.

^{2/} Comments of Cox at n.4.

carriers, have a duty to provide number portability.

4. Congress clearly chose to impose some duties only on LECs and not on all telecommunications carriers, a broader term that includes CMRS providers. Furthermore, Congress specifically excluded CMRS operators from the LEC definition.^{3/} As both BellSouth and MobileMedia correctly note in their Supplemental Comments, the structure established by Congress is based on the recognition that the competitive considerations applicable to LECs generally do not apply to CMRS.^{4/} Unless and until CMRS providers compete with facilities-based providers, they should not have the same obligations as LECs.^{5/} Finally, as the Arch and AirTouch Paging Supplemental Comments demonstrate, the legislative history of the Act provides additional support for not imposing number portability and other LEC obligations on CMRS providers -- particularly paging companies -- at this time.^{6/}

^{3/} 47 U.S.C. § 153(44).

^{4/} See Comments of MobileMedia at 5.

^{5/} See Comments of BellSouth at 5-6.

^{6/} Supplemental Comments of Arch and AirTouch Paging at p. 4.

WHEREFORE, the foregoing premises duly considered,
Arch Communications Group and AirTouch Paging respectfully
request that the Commission adopt rules in this proceeding
consistent with the foregoing.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Loretta Clark, a secretary with the law firm of Paul, Hastings, Janofsky & Walker, hereby certify that a copy of the foregoing Joint Supplemental Reply Comments of AirTouch Paging and Arch Communications Group was sent by first class, postage prepaid, United States mail or hand delivery on April 5, 1996, to the following:

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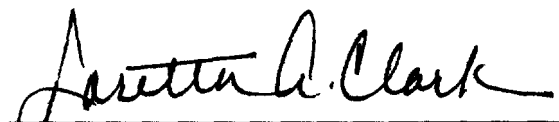
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